

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WAG ACQUISITION, LLC,

Plaintiff,

v.

FLYING CROCODILE, INC., d/b/a FCI,
INC., et al.

Defendants.

Case No. 2:19-cv-01278-BJR

**STIPULATED MOTION AND ORDER TO
EXTEND DAMAGES DISCOVERY
DEADLINE**

The parties stipulate as follows:

1. On December 10, 2021, the Court issued an Order granting the parties' second request for an extension of the damages discovery period until January 28, 2022 (ECF No. 283).

2. Following that Order, the parties proceeded to schedule individual and Rule 30(b)(6) depositions in January to accommodate the holidays and the parties' continued discussions on their various discovery disputes.

3. On January 9, 2022, Defendants' counsel were advised that its corporate deposition witness was exposed to COVID-19 from immediate family members.

4. In addition, one of Plaintiff's witnesses underwent a significant surgical procedure in late December and is still in recovery.

5. As a result of these developments, the parties are unable to complete depositions pursuant to the prior stipulated schedule.

6. To realistically accommodate these health issues and potential continuing issues arising from spikes in COVID-19 cases, the parties respectfully request an additional seventy (70) days to complete damages discovery, until April 8, 2022.

7. Extending the damages discovery deadline will not prejudice either party and will not impact any other deadline in this matter.

DATED: January 13, 2022.

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ORDER

IT IS SO ORDERED, this 13th day of January, 2022.

A handwritten signature in black ink, reading "Barbara Jacobs Rothstein", written over a horizontal line.

Barbara Jacobs Rothstein
U.S. District Court Judge